

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Case #2:12-cv-00182-ECR-VCF

IN RE ZAPPOS SECURITY BREACH ) CORRECTED  
LITIGATION ) VERIFIED PETITION FOR  
----- ) PERMISSION TO PRACTICE  
THIS DOCUMENT RELATES TO: ) IN THIS CASE ONLY BY  
ALL ACTIONS ) ATTORNEY NOT ADMITTED  
----- ) TO THE BAR OF THIS COURT  
----- ) AND DESIGNATION OF  
----- ) LOCAL COUNSEL  
----- ) (Re: 2:12-cv-00232 Doc. 12)  
----- ) ORDER GRANTING

JEREMIAH FREI-PEARSON, Petitioner, respectfully represents to the Court:  
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of  
Meiselman, Denla, Packman, Carton & Eberz, P.C.  
(firm name)

with offices at 1311 Mamaroneck Avenue,  
(street address)  
White Plains, New York, 10605,  
(city) (state) (zip code)  
914-517-5000, jfrei-pearson@mdpcelaw.com.  
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by  
Shari Simon and Katharine Vorhoff to provide legal representation in connection with  
[client(s)]

the above-entitled case now pending before this Court.

1       3. That since September 22, 2004 (date), Petitioner has been and presently is a  
 2 member in good standing of the bar of the highest Court of the State of New York (state)  
 3 where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or  
 4 from the clerk of the supreme court or highest admitting court of each state, territory, or insular  
 5 possession of the United States in which the applicant has been admitted to practice law certifying  
 6 the applicant's membership therein is in good standing.

7       4. That Petitioner was admitted to practice before the following United States District  
 8 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts  
 9 of other States on the dates indicated for each, and that Petitioner is presently a member in good  
 10 standing of the bars of said Courts.

Court	Date Admitted	Bar Number
New York State Court	September 22, 2004	423922
U.S. District Court, Southern District of New York	September 22, 2004	JFP 1509
U.S. District Court, Eastern District of New York	September 22, 2004	JFP 1509

19       5. That there are or have been no disciplinary proceedings instituted against petitioner,  
 20 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory  
 21 or administrative body, or any resignation or termination in order to avoid disciplinary or  
 22 disbarment proceedings, except as described in detail below:

23       N/A  
 24  
 25  
 26  
 27

1       6.    That Petitioner has never been denied admission to the State Bar of Nevada. (Give  
2       particulars if ever denied admission):

3       No.

6       7.    That Petitioner is a member of good standing in the following Bar Associations:

7       N/A

10      8.    Petitioner has filed application(s) to appear as counsel under Local Rule IA 10-2  
11       during the past three (3) years in the following matters:

12       Date of Application	13       Cause	14       Title of Court 15       Administrative Body 16       or Arbitrator	17       Was Application 18       Granted or 19       Denied
20       N/A			
21			
22			
23			
24			
25			
26			
27			
28			

19       (If necessary, please attach a statement of additional applications)

20      9.    Petitioner consents to the jurisdiction of the courts and disciplinary boards of the  
21       State of Nevada with respect to the law of this state governing the conduct of attorneys to the same  
22       extent as a member of the State Bar of Nevada.

23      10.   Petitioner agrees to comply with the standards of professional conduct required of  
24       the members of the bar of this court.

25      11.   Petitioner has disclosed in writing to the client that the applicant is not admitted to  
26       practice in this jurisdiction and that the client has consented to such representation.

1 That Petitioner respectfully prays that Petitioner be admitted to practice before this Court  
2 FOR THE PURPOSES OF THIS CASE ONLY.

STATE OF New York )  
5 COUNTY OF Westchester )

Petitioner's signature

7 Jeremiah Frei-Pearson, Petitioner, being first duly sworn, deposes and says:

8 That the foregoing statements are true.

Jeremiah S. P.

10 Subscribed and sworn to before me this

Petitioner's signature

13 day of March, 2012

13 Annette D. Hise  
Notary Public or Clerk of Court

ANNETTE D. HISE  
Notary Public, State of New York  
No. 01HI6139179  
Qualified in County of Dutchess  
Commission Expires January 03, 2014

**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO  
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner  
18 believes it to be in the best interests of the client(s) to designate Brent A. Carson,  
19 (name of local counsel)  
20 Attorney at Law, member of the State of Nevada and previously admitted to practice before the  
21 above-entitled Court as associate resident counsel in this action. The address and email address of  
said designated Nevada counsel is:

23 **510 South Eighth Street**  
(street address)

24 Las Vegas, Nevada 89101  
25 (city) (state) (zip code)

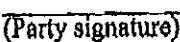
26                   **702-471-1111**,                   **bac@wimmercarson.com**  
27                   (area code + telephone number)                   (Bmail address)

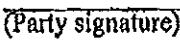
1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes  
2 agreement and authorization for the designated resident admitted counsel to sign stipulations  
3 binding on all of us.

4  
5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6  
7 The undersigned party(ies) appoint(s) BRENT A. CARSON as  
8 (name of local counsel)  
his/her/their Designated Resident Nevada Counsel in this case.

9  
10   
(Party signature)

11   
(Party signature)

12   
(Party signature)

13  
14 **CONSENT OF DESIGNEE**

15  
16 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

17   
18 Designated Resident Nevada Counsel's signature

19  
20 5903 bac@wintercarson.com,  
21 Bar number Email address

22  
23 APPROVED:

24 Dated: this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

25 SEE BELOW

26 UNITED STATES DISTRICT JUDGE

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes  
2 agreement and authorization for the designated resident admitted counsel to sign stipulations  
3 binding on all of us.

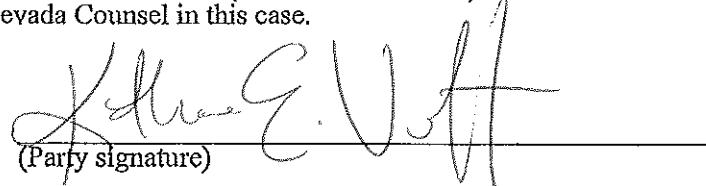
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5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

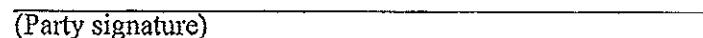
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7 The undersigned party(ies) appoint(s) BRENT A. CARSON as  
8 (name of local counsel)  
his/her/their Designated Resident Nevada Counsel in this case.

9

  
(Party signature)

10

  
(Party signature)

11

  
(Party signature)

12

13

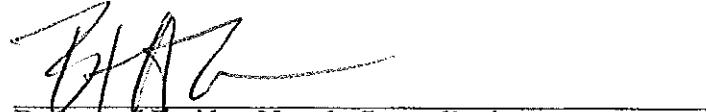
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CONSENT OF DESIGNEE

16

17

The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

  
Designated Resident Nevada Counsel's signature

20

5903 bacew@nvrail.com  
Bar number Email address

21

23

APPROVED:

24

Dated: this 14th day of March 2012.

25

  
Edward C. Reed.

26

UNITED STATES DISTRICT JUDGE

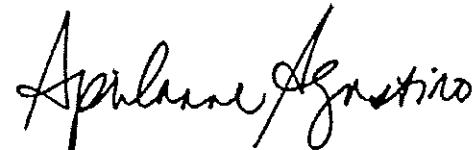
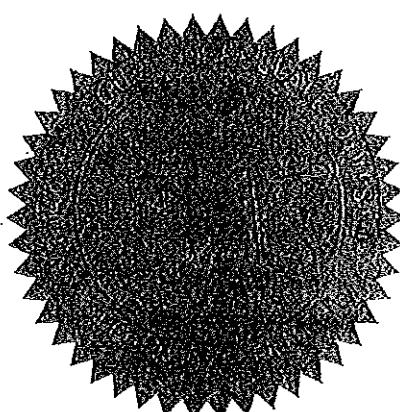
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Appellate Division of the Supreme Court  
of the State of New York  
Second Judicial Department

I, Aprilanne Agostino, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that Jeremiah Lee Frei-Pearson was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 22<sup>nd</sup> day of September 2004, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on February 23, 2012.



Clerk of the Court